

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC. and AMERICAN
OVERSIGHT,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY,

Defendant.

Civil Action No. 19-10916-NMG

**DECLARATION OF KATHERINE M. ANTHONY IN SUPPORT OF PLAINTIFFS’
CROSS-MOTION FOR SUMMARY JUDGMENT AND IN OPPOSITION TO
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

I, KATHERINE M. ANTHONY, hereby declare as follows:

1. I am an attorney at American Oversight, a plaintiff in the above-captioned litigation. I submit this Declaration in support of Plaintiffs’ Cross-Motion for Summary Judgment and in Opposition to Defendant’s Motion for Summary Judgment. The facts set forth in this Declaration are true and of my own personal knowledge.

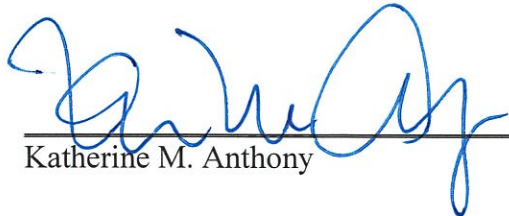
2. Attached hereto as Exhibit 1 are true and correct copies of excerpts of the 2018 Border Security Improvement Plan (“Border Security Plan”) released by Defendant the U.S. Department of Homeland Security (“DHS”) to Plaintiffs on September 3, 2019, in response to a request submitted by Plaintiffs pursuant to the Freedom of Information Act.

3. DHS released a supplemental copy of the Border Security Plan to Plaintiffs on October 2, 2019, removing certain redactions from pages no longer at issue in this action. This supplemental copy did not include Bates numbers, and so Plaintiffs have included excerpts from the September 3, 2019, Bates-stamped version of the report, for ease of reference.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 23, 2019

Respectfully submitted,



Katherine M. Anthony

Certificate of Service

I hereby certify that this document will be served on all registered participants through the Court's CM/ECF system.

October 23, 2019

/s/ Katherine M. Anthony